



THE CITY OF NEW YORK
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October 16, 2015

BY ECF

Honorable Marilyn D. Go
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ying Li v. City of New York, et al.
15-CV-1599 (PKC)(MDG)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to the defense in the above-referenced matter. Enclosed please find a duly executed Attorney's Eyes Only Stipulation and Protective Order for endorsement and filing by the Court. Thank you for your consideration herein.

Respectfully submitted,

/s/

Qiana Smith-Williams
Senior Counsel

Encl.

cc: By ECF
Ameer Benno, Esq.
Corey Lee, Esq.
Poupa Jenny Marashi, Esq.
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X
YING LI,

Plaintiff,

-against-

CITY OF NEW YORK, et al.,

Defendants.
----- X

**STIPULATION AND
PROTECTIVE ORDER FOR
ATTORNEY'S EYES ONLY**

15-CV-1599 (PKC)(MDG)

WHEREAS, the Court has ordered that defendant City of New York provide to plaintiff a last-known address for individually named defendant Detective David Moser ("Moser"), a former detective with the New York City Police Department;

WHEREAS, defendant City believes that Moser's last-known address is information of a personal nature, the disclosure of which may pose some risk to Moser; and

WHEREAS, such information is of a confidential and sensitive nature and implicates the privacy and security interests of Mr. Moser; and

WHEREAS, disclosure of such information should be for **ATTORNEYS' EYES ONLY**, and should be disseminated only to plaintiff's counsel; and

WHEREAS, defendant City objects to the disclosure of this information except on the following grounds;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for plaintiff and defendant City, as follows:

10/16/15 10:00 AM
10/16/15 10:00 AM

1. As used herein, “Confidential Materials – Attorneys’ Eyes Only” shall refer to the last-known address of Moser, as well as any other personal information of Moser in the possession, custody, or control of defendant City of New York.

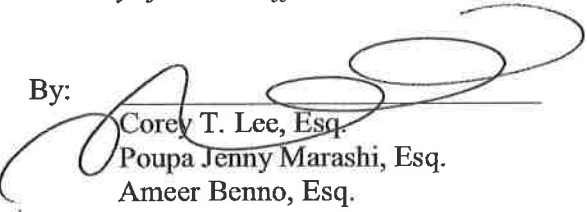
2. Plaintiff’s attorneys shall not disclose the “Confidential Materials – Attorneys’ Eyes Only” to any member of their law office staff, except to a process server solely for the purpose of effecting service in this matter.

3. Plaintiff’s attorney shall not disclose the “Confidential Materials – Attorneys’ Eyes Only” to plaintiff.

Dated: New York, New York
September 25 2015

COREY T. LEE, ESQ.
POUPA JENNY MARASHI, ESQ.
AMEER BENNO, ESQ.
Attorneys for Plaintiff

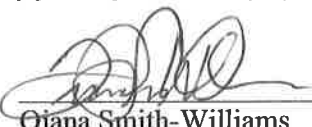
By:



Corey T. Lee, Esq.
Poupa Jenny Marashi, Esq.
Ameer Benno, Esq.

ZACHARY W. CARTER
Corporation Counsel of
the City of New York
Attorney for Defendant City of New York

By:



Qiana Smith-Williams
Senior Counsel

SO ORDERED:

HONORABLE MARILYN D. GO
United States Magistrate Judge